

## Remarks

### Specification:

The specification was amended to eliminate the inadvertently-placed reference numeral 303 from the first paragraph on page 3.

### Rejections Under 35 USC 101:

Claims 9-20 were rejected under 35 USC 101 because the claimed invention is directed to non-statutory subject matter. The Examiner states that although the claim recites an apparatus, there is no hardware component recited in the claim in order to enable the function to be realized.

Regarding claims 9-16, these claims have been amended to eliminate “means-plus-function” language and point out and clarify that the hardware-component table generator 307 specifically performing the functions claimed.

Regarding claims 17-20, these claims specifically include the hardware component of a table generator 303. The Applicants assert that the table generator 303 is a specific hardware component, and thus claims 17-20 are properly claimed under 35 USC 101.

### Claim Rejections Under 35 USC 103(a):

Claims 1-20 were rejected under 35 USC 103(a) as being unpatentable over Saldanha (6714939) in view of Davis (6829759). Regarding claim 1, Examiner Le states that Saldanha discloses the Applicants’ claimed elements of accessing a domain model, accessing a specialized computer language specification, and associating elements from the domain model to functions and arguments of the specialized computer language specification. Examiner Le states that Saldanha does not explicitly teach creating the translation table based on the associations between the domain model and functions and arguments of the specialized computer language. In order to fill this void, Examiner Le states that Davis teaches creating a translation table. Examiner Le concludes that it would be obvious to combine the teachings of the cited references to provide users with a translation table without the need to rewrite the entire program.

Analysis of both Saldanha and Davis reveals that these references (alone or in combination) fail to teach or otherwise suggest the Applicants' claimed subject matter of creating a translation table ***based on the associations between the domain model and functions and arguments of the specialized computer language***. In fact, Examiner Le never addressed this claim limitation in its entirety. More particularly, Examiner Le merely states that "Davis teaches creating [a] translation table." Examiner Le never states that Davis teaches creating such a translation table based on the associations between the domain model and functions and arguments of the specialized computer language.

Notwithstanding the above, analysis of Davis reveals that this reference teaches the creation of a translation display, however the translation display of Davis is created by partitioning a source and translation file into partitions, and aligning the corresponding source and translation groups. (See Claim 1 of Davis). Davis never teaches creating such a table based on the associations between the domain model and functions and arguments of the specialized computer language. Because of this, all claims are allowable over the prior art of record.

Regarding all other claims, since all claims have the limitation of creating a translation table ***based on the associations between the domain model and functions and arguments of the specialized computer language***, all claims are allowable over the prior art of record.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein; and no amendment made was for the purpose of narrowing the scope of any claim, unless Applicant has argued herein that such amendment was made to distinguish over a particular reference or combination of references. As the Applicant has overcome all substantive rejections given by the Examiner the Applicant contends that this Amendment, with the above discussion, overcomes the Examiner's rejections to the pending claims. Therefore, the Applicant respectfully requests allowance of the application. If the Examiner is of the opinion that any issues regarding the status of the claims remain after this response, the Examiner is invited to contact the undersigned representative to expedite resolution of the matter. Finally, please charge any fees (including extension of time fees) or credit overpayment to Deposit Account No. 502117.

Respectfully Submitted,  
Russell, ET AL.

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